

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

FRED HANEY, MARSHA MERRILL,
SYLVIA RAUSCH, STEPHEN
SWENSON, and ALAN WOOTEN,
individually, and on behalf of all others
similarly situated,

Plaintiffs

v.

GENWORTH LIFE INSURANCE
COMPANY and GENWORTH LIFE
INSURANCE COMPANY OF NEW
YORK,

Defendants.

Civil Action No.: 3:22-CV-00055-REP

DECLARATION OF CARROL LANG

Comes now Carroll Lang and states the following under oath and under penalty of perjury in support of her objection:

1. My name is Carroll Lang. I am over the age of eighteen (18) years. I am qualified and competent to make this affidavit. The facts stated herein are within my personal knowledge.
2. My current address is 3820 Camanche Pkwy N, Ione, CA 95640-9486. My husband Lonny Lang and I moved to this address in 2009.
3. My husband and I are Policyholders of Genworth Life Insurance Company (“Genworth” or “GLIC”) long-term care insurance, Choice 2 in force during the class period and issued in Oregon. Specifically, in 2007 GLIC issued us an Oregon 7044OR policy, which is a Choice 2 Class Policy according to the class notice.
4. After we received the class notice in this case, we contacted and eventually retained Robert Clore of the Bandas Law Firm along with Blake Weiner, Blake Weiner Law, PLLC. As part of our

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4. After we received the class notice in this case, we contacted and eventually retained Robert Clore of the Bandas Law Firm along with Blake Weiner, Blake Weiner Law, PLLC. As part of our efforts in objecting to the settlement we produced relevant documents related to our policy, frequently discussed our policy and concerns regarding the proposed Settlement Agreement with Mr. Clore and Mr. Weiner, reviewed numerous court filings, discussed several proposals to improve the settlement, and participated in a mediation.

5. Throughout the course of representation, our attorneys updated us on the status of the proceedings and settlement negotiations. Together, we provided our thoughts and input as to the adequacy of payments for the Non-Forfeiture Status class members.

6. We believed the \$1,000 payment for Non-Forfeiture Status members offered in the class action settlement was too low. We also refused to agree to the initial objector settlement that increased the payment to \$1,150. We only agreed to the subsequent increase of \$1,250 for the Non-Forfeiture Status members. We are proud of our role in improving the class benefits.

6. I am satisfied with the efforts of our attorneys and the settlement of our Objection resulting from those efforts. For that reason, I consent to the fees they request.

Dated this the 30th day of January 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Carrol Lang